

LEGISLATIVE AND REGULATORY UPDATE

PA SECTION AWWA SOUTHCENTRAL/NORTHCENTRAL DISTRICTS
WWOAP CENTRAL SECTION

FALL JOINT CONFERENCE | NOVEMBER 4, 2022

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WWOAP LEGISLATIVE & REGULATORY AFFAIRS COMMITTEE CHAIRMAN



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Engineering, Surveying and Environmental Services

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LEGISLATIVE UPDATE



House and Senate Session Schedule

2022 HOUSE SESSION SCHEDULE

November 14, 15, 16

2022 SENATE SESSION SCHEDULE

November 15

The Legislature will adjourn on November 30th, 2022.



House and Senate – Pre-Election Status

2022 HOUSE ELECTION STATUS

All 203 House Seats are up for election on November 8th
Going into the election Republicans hold 113 seats
Democrats hold 89 seats with one vacancy

2022 SENATE ELECTION STATUS

25 Senate seats are up for election on November 8th
Going into the election Republicans hold 13 of the seats up for election
Democrats control 11 seats and
1 Independent



LEGISLATIVE UPDATE

House Bill 1842 – Zimmerman

Senate Bill 545 – Yaw

Clean Streams Law – Spill Reporting

- Amends the Clean Streams Law, in other pollutions and potential pollution, providing for notice of discharge endangering public health or environment.
- **NOTE:** Opposition to the bill concerns the elimination of critical safeguards in the Clean Streams Law that protect waterways from spills. The major concern is that this bill would allow polluters to decide whether a spill should be reported to PA DEP.
- PA DEP is opposed to this bill.
- **NOTE:** In response to this proposed legislation, PA DEP issued Draft Technical Guidance: Notification Requirements for Spills, Discharges and Other Incidents That Threaten To Cause Pollution of the Waters of the Commonwealth. This will be discussed later in the Regulatory presentation.



LEGISLATIVE UPDATE

House Bill 2404 – Owlett House Bill 2405 – Pickett House Bill 2406 – Fritz House Bill 2407 – Hamm Creek and Stream Maintenance

- **HB 2404** – Would allow local government organizations and PennDOT to apply for a permit for continuing maintenance for a period of at least ten years for the streams within their jurisdictions.
- **HB 2405** - Would create a program that allows counties to opt in to address hazards within their streams by allowing for emergency permits in consultation with their county conservation district.



LEGISLATIVE UPDATE

House Bill 2406

House Bill 2407

Creek and Stream Maintenance – cont'd.

- **HB 2406** – Would create a permit specific to smaller maintenance projects for the mitigation of flood-related hazards of less than 250 linear feet. This permit would be reviewed and issued by the local county conservation
- **HB 2407** – Would clarify that the Pennsylvania Fish and Boat Commission has no authority for permitting or enforcement related to stream clearing or maintenance activities. The authority shall belong solely to the Pennsylvania Department of Environmental Protection and the county conservation districts as appropriate.
- **STATUS:** Senate Environmental Resources and Energy Committee approved the bills on 10/18/22, now pending action by the full Senate.



LEGISLATIVE UPDATE

House Bill 2860 - Nelson Workers Compensation and Worker Protection

- Establishes the Public Sector Worker Safety Data Analysis Act and directs the PA Department of Labor and Industry to establish a program to require public sector employees to record and report work-related injuries and illnesses required by private employers under 29 CFR Pt. 1904.
- On October 24, 2022 a public hearing was held by the House Labor and Industry Committee, Subcommittee on Workers Compensation and Worker Protection. PMAA provided testimony at the hearing.
- Some issues of concern are whether the method of data collection will be electronic and whether security is ensured to protect the confidentiality of the data being collected and transmitted. Employee data, that is medical in nature is of particular concern for cybersecurity breaches.



LEGISLATIVE UPDATE

SB 597 - Stephano – Water and Wastewater Asset Management Plans

- **NOTE:** The most recent, substantive changes are presented in red.
- Amends Title 66 (Public Utilities) providing for water and wastewater asset management plans. **The bill was amended on 3rd Consideration, 4/11/22 and moved to Title 27 (Environmental Resources).**

Key Definitions

- **“Community water system”.** A public water system which serves at least **751** service connections used by year-round residents. **The term does not include:**
 - An entity which has applied to the PUC for a voluntary change in rates within 5 years of the effective dates of this section (6 months).
 - A community water system owned by a planned community.



SB 597 - Stephano – Water and Wastewater Asset Management Plans – cont'd.

- **“ Community wastewater system”**: A publicly or privately owned community sewage system which serves at least **751** service connections used by year-round residents that uses a method of sewage collection, conveyance treatment or disposal other than renovation in a soil absorption area or retention in a retaining tank. **The term does not include:**
 - A municipally owned and operated sewage system that owns and operates a wastewater system which has applied to the PUC for a voluntary change in rates within 5 years of the effective date of this section (6 months)
 - A community sewage system owned by a planned community.



SB 597 - Stephano – Water and Wastewater Asset Management Plans – cont'd.

- **Community water and wastewater system asset management plan:**
 - No later than 12 months after the effective date, a water or wastewater system operator shall annually submit an asset management plan every **3 years to the PA DEP for review and approval.**
 - The plan shall be designed to inspect, maintain, repair and renew the water or wastewater system operator's infrastructure consistent with federal and state laws.
 - The plan must include a schedule under which the water system operator or the wastewater system operator will achieve the plan goals

- **Critical valve inspections:**
 - A water system operator shall inspect each critical valve in its system (in the asset management plan), no less than every three years and at any time the water system operator installs, repairs or relocates a critical valve.



LEGISLATIVE UPDATE

SB 597 – cont'd.

– Fire hydrants

- A water system operator shall annually inspect at least 33% of the fire hydrants in the system in a manner that each fire hydrant is exercised over the course of four years to determine each fire hydrant's working condition.
- The water system operator shall formulate and implement a plan for flushing fire hydrants and at dead ends of water mains as water quality needs dictate.
- The water system operator shall keep a record of each inspection, test and flushing for six years.
- The water system operator shall identify the geographic location of each fire hydrant using a global positioning system based on satellite or other location technology.

– Water meters:

- A water provider must:
 - Set an allowable error rate and develop a testing protocol as part of the asset management plan
 - Allow for replacement of a water meter entirely



LEGISLATIVE UPDATE

SB 597 – cont'd.

- **Water meters – continued:**
- **Meter test records**
 - If a water meter is tested, the original test record shall be kept including:
 - The meter identification information
 - The reason for testing
 - The reading of the meter before being disturbed and
 - The accuracy of the meter together with data taken at the time of the test
 - The record shall be sufficiently complete to permit the convenient checking of the methods used and the calculations made.
 - In addition to the above records, a record shall be kept indicating:
 - The date of the meter purchase
 - The name of the manufacturer
 - The meter's size, identification, various places of installation and removal; and
 - The dates and general results of each test.



LEGISLATIVE UPDATE

SB 597 – cont'd.

- **Water meters – continued:**
- **Installation and removal of meters**
 - Within 60 days of installation, a water meter shall be inspected by the water system operator for mechanical condition and suitability of location.
 - For a new meter or a meter reconditioned by a manufacturer, the test results of the manufacturer may be accepted as the installation test if the water system operator has verified the manufacturer's reported test results by testing the greater of 10% or 10 meters of a shipment of meters.
 - In an emergency, a meter not meeting these requirements may be installed temporarily.
 - A water meter that is removed from service with the intent for the water meter to return to service shall be tested within 30 days for accuracy to complete the meter's test history.
 - When a meter is temporarily removed from service, the water meter shall be properly sealed to secure registers and measuring devices until the water meter can be properly tested for accuracy.



SB 597 – cont'd.

- **Development of cybersecurity system**
 - A water and wastewater system operator shall develop a cybersecurity program that:
 - Is developed by an accredited cybersecurity professional
 - Implements organizational accountability and responsibilities for cyber risk management activities; and
 - Establishes policies, plans, processes and procedures for identifying, reporting, and mitigating cyber risk to the system

- **Contingency for public funding**
 - Before a water or wastewater system operator may receive a subsidized loan or other financial assistance from the Commonwealth, the system must demonstrate that the operator has developed or is in the process of developing an asset management program.



LEGISLATIVE UPDATE

SB 597 – cont'd.

- **Annual information to customers**
 - A water system operator shall annually inform the operator's customers of compliance with this chapter in a manner established by PA DEP.

- **Enforcement**
 - For a water or wastewater system operator required to submit an asset management plan, the PA DEP **shall** issue an order, enter into a consent order, assess a civil penalty to take any other action necessary to enforce compliance (Water and Wastewater Asset Management Plans) that the PA DEP is authorized to take for violations under any of the following:
 - The Clean Streams Law
 - The Pennsylvania Sewage Facilities Act
 - The Pennsylvania Safe Drinking Water Act
 - Chapter 31 (relating to Water Resources Planning)



SB 597 – cont'd.

– **Lead service lines:**

- Within one year of the effective date, a water system operator shall submit a plan to remove and replace all lead service lines within or connected to the operator's public water system.

– **PA DEP costs:**

- The program costs for PA DEP implementation and enforcement of this chapter shall be included in the PA DEP's proposed budget and **shall be assessed** upon the community water system operator or owner and a community water system operator or owner.
- The community water system operator or owner and the community wastewater system operator or owner shall report annually to the PA DEP the gross intrastate operating revenues for the preceding calendar year.

- **Regulations:**

- The PA DEP shall promulgate regulations to implement and administer this chapter.



LEGISLATIVE UPDATE

SB 597 – cont'd.

STATUS: SB 597 passed the Senate on Tuesday, June 7, 2022 on a vote of 27 to 23. The bill was moved to the House Environmental Resources and Energy Committee for consideration.

NOTE: On Tuesday, August 2, 2022 – The House Environmental Resources and Energy Committee held an informational meeting on SB 597 at 10:00 a.m., in Room G-50, Irvis Office Building.

The following organizations provided testimony before the House Environmental Resources and Energy Committee opposing SB 597: The Pennsylvania Municipal Authorities Association, The Pennsylvania Office of Consumer Advocate, The Pennsylvania State Association of Boroughs and The Water Works Operators' Association of Pennsylvania (WWOAP). Previously, The Pennsylvania Rural Water Association (PRWA), The Eastern Pennsylvania Water Pollution Control Operators' Association (EPWPCOA), and the Pennsylvania Water Environmental Association (PWEA) submitted letters to the Legislature opposing SB597.



LEGISLATIVE UPDATE

SB 597 – cont'd.

The following organizations provided testimony before the House Environmental Resources and Energy Committee in support of SB 597: Aqua Pennsylvania, Pennsylvania American Water and The Pennsylvania Chamber of Business and Industry.



LEGISLATIVE UPDATE

SB 597 – ISSUES WITH SB 597

- Asset Management Plan – requiring community water systems to publish asset management reports on publicly accessible Internet websites is in direct violation of security protocols that have been in place since 9/11. Providing descriptions and locations of vulnerable water system infrastructure in a public format is inviting potential security breaches to critical water supply systems and risking public health and welfare.
- Critical valve inspections – Community water systems currently follow best management practices recommended by the valve manufacturers and the American Water Works Association (AWWA).
- Water Meters - meter maintenance is dictated by the manufacturers' recommendations. The additional testing mandated in SB 597 would require considerable additional costs to water systems. The proposed requirements need to have a value vs. cost analysis completed to assess the benefit provided to water system customers/consumers to justify the requirements.



LEGISLATIVE UPDATE

SB 597 – ISSUES – cont'd.

- Development of Cybersecurity System – Both PA DEP and the Department of Homeland Security have provided self-assessment tools for water systems to evaluate system and cybersecurity vulnerabilities. Further, the America's Water Infrastructure Act (AWIA) strengthened the requirements for systems to self-assess asset and cyber vulnerabilities. The information is specifically NOT TO BE SHARED with EPA or other regulatory entities, but is certified by the system to have been completed. All certified system operators are also required to complete security training. **NO STANDARD CERTIFICATION EXISTS FOR CYBERSECURITY PROFESSIONALS** as is required under SB 597.



LEGISLATIVE UPDATE

SB 597 – ISSUES – cont'd.

- Annual Information to Customers – water systems already complete and provide to all customers a Consumer Confidence Report (CCR) annually under Chapter 109, Safe Drinking Water Regulations. Moreover, the Public Notification Rule requires one-hour notice to PA DEP and notice to the customers. EPA is revising the CCR requirements to require bi-annual reports be submitted to customers.
- Contingency for Public Funding – All Commonwealth funding sources currently require that water systems be in compliance with the Safe Drinking Water Regulations and/or require engineering, feasibility studies and financial analysis for the majority of projects under funding consideration.
- Enforcement – PA DEP already has enforcement authorization under the Clean Streams Law, The Sewage Facilities Act, and The Safe Drinking Water Act. Enforcement under Chapter 31 relating to Water Resources Planning is regulatory over-reach and should not be included in an Asset Management Plan Bill.



SB 597 – ISSUES – cont'd.

- PA DEP Costs – the costs for the requirements of this chapter will be assessed upon the water and wastewater systems, potentially based on the system's operating revenues for the prior year. Systems already pay fees to PA DEP annually as well as for all permits required by the systems.
- PA DEP anticipates that 16 additional staff will be required in the Safe Drinking Water Program, totaling \$2 million in anticipated costs. Approximately 535 community water systems would be subject to the provisions of SB 597, resulting in an annual fee of \$3,738 for each system subject to the provisions of the bill.
- PA DEP anticipates that 16 additional staff will be required in the Clean Water Program, totaling \$2 million in anticipated costs. Approximately 1,068 sewage facilities would be subject to the provisions of SB 597, resulting in an annual fee of \$1,872 for each system subject to the provisions of the bill.



LEGISLATIVE UPDATE

Senate Bill 1125 – Pittman Legionnaires' Disease

- Amends Titles 27 (Environmental Resources) and 35 (Health and Safety) providing for Legionnaires' disease risk management in public water systems and the adoption of mandatory water management plans for public water systems. Provides that the Environmental Quality Board, in conjunction with the Department of Environmental Protection, shall address the safety of public water systems across the Commonwealth as they relate to the Legionella pneumophila bacteria. Establishes the Legionnaires' Disease Drinking Water Risk Management Restricted Account in the General Fund to provide grant awards to owners and operators of public water systems and covered buildings with bacteria water management plans. Provides for regulations, owner and operator liability and penalties, prosecutions, and fines for owners and operators of covered buildings and their water management plans.
 - Would direct both public drinking water providers and certain building owners to assess their respective water systems for risk and adopt simple mitigation measures:
 - Flushing clean water through the system
 - Keeping hot and cold water at appropriate temperatures
 - Monitoring the system regularly



LEGISLATIVE UPDATE

Senate Bill 1125 – Pittman Legionnaires' Disease – cont'd.

- Would codify the seven-step industry standard, ASHRAE-188-2018 (currently the standard is only voluntary and not widely adopted) which establishes legionellosis risk management for building water systems
- The Senate Environmental Resources and Energy Committee intends to further study the issue. Chairman Yaw noted the Committee will meet for another voting meeting..



REGULATORY UPDATE



New or Revised Federal Drinking Water Regulations

SCHEDULE: Note-Dates May Change

- 4/22 - Part 142 - Final Rule: Cybersecurity in Public Water Systems
- ?/22 - Part 141 - Proposed Rule: Water System Restructuring Assessment Rule (WSRAR)
- 9/22 - Part 141 - Proposed Rule: PFAS Regulation
- 3/23 - Part 141 - Proposed Rule: CCR Revisions
- ?/23 - Part 141 - Proposed Rule: LCRI
- 9/23 - Part 141 - Final Rule: PFAS Regulation
- 3/24 - Part 141 - Final Rule: CCR Revisions
- 7/24 - Part 141 - Proposed Rule: MDBPs per 2020 Settlement with Waterkeepers Alliance
- 10/24 - Part 141 - Final Rule: LCRI
- 9/27 - Part 141 - Final Rule: MDBPs per 2020 Settlement with Waterkeepers Alliance



Final Fifth Drinking Water Contaminant Candidate List (CCL 5)

- On November 3, 2022, the U.S. EPA published the Final Fifth Drinking Water Contaminant Candidate List (CCL 5) which will serve as the basis for EPA's regulatory considerations over the next 5-year cycle under the SDWA. The update includes a substantial expansion of per- and polyfluoroalkyl substances (PFAS). This is an important first step in identifying additional PFAS that may require regulation under the SDWA.
- In addition to a group of PFAS, the Final CCL 5 includes 60 individually listed chemicals, two additional chemical groups: cyanotoxins and disinfection byproducts (DBPs); and 12 microbes.
- **See the US EPA website for additional information on the CCL 5.**



Maximum Contaminant Level for PFAS

- On July 14, 2022, PA DEP presented the **DRAFT- Final PFAS RULEMAKING** at the Public Water System Technical Assistance Center (TAC) Board Meeting. The TAC Board recommended approval of the Draft-Final Rulemaking.
- On October 12, 2022, the Environmental Quality Board (EQB) adopted the Final Rulemaking: Safe Drinking Water PFAS MCL Rule (25 Pa. Code Chapter 109 by a 15 to 3 vote.
- **The Rulemaking now goes to IRRC and the standing legislative committees.**



Maximum Contaminant Level for PFAS – Cont'd.

- Final rulemaking moves forward with MCLs for PFOA and PFOS.
- Final rulemaking does not propose an MCL for other PFAS chemicals at this time:
 - Lack of occurrence data > MCLG
 - Incomplete cost/benefit data and analysis
 - Reference dose was not derived due to lack of evidence on its toxicity
 - Lack of treatability data
- **PROPOSED PFOA MCL of 14 parts per trillion (ppt)**
- **PROPOSED PFOS MCL OF 18 parts per trillion (ppt)**
- **The proposed MCLs are within the range and same magnitude as other state standards.**

Note:

- **On June 15, 2022 EPA released new health advisories for four PFAS substances:**
 - **PFOA – 0.004 ppt**
 - **PFOS – 0.02 ppt**
 - **Gen X – 10 ppt**
 - **PFBS – 2,000 ppt**



Maximum Contaminant Level for PFAS – Cont'd.

- The following documents are available at:
<https://www.dep.pa.gov/PublicParticipation/AdvisoryCommittees/WaterAdvisory/TAC/Pages/2022-Meetings.aspx>
 - PFAS RULE PRESENTATION
 - DRAFT-FINAL ANNEX A, PFAS RULE



Water Quality Standard for Manganese

- (#7-533) Administrative Code of 1929, Pennsylvania Clean Streams Law, Federal Clean Water Act 25 Pa Code Chapters 93 and 96.
- Proposes a new human health criterion for manganese of 0.3 mg/l in Chapter 93.8 – Water Quality Criteria for Toxic Substances and would delete the existing 1 mg/l standard because it is not protective of human health.
- Research conducted by PA DEP concluded the effects of manganese on human health is harmful as a nervous system toxin with impacts to early childhood development and that 0.3 mg/l is protective of human health.
- Proposes two alternative points of compliance:
 - All existing or planned surface potable water supply withdrawals **OR**
 - All surface waters at point of discharge



Water Quality Standard for Manganese – cont'd.

- On September 12th, the Independent Regulatory Review Commission (IRRC) disapproved the proposed Final Water Quality Standard for Manganese Regulation by a 4 to 1 vote.
<http://www.irrc.state.pa.us/docs/3260/IRRC/3260%2010-11-22%20DISAPPROVAL.pdf>
- On October 11, 2022 IRRC submitted its Disapproval Order to the Environmental Quality Board. If PA DEP wishes to proceed with this regulation, they have 40 days from the delivery of IRRC's Disapproval Order to make the changes requested or keep the regulation unchanged and resubmit the regulation to both IRRC and the legislative standing committees.



Available Funding

- **Commonwealth Financing Authority: Covid 19 American Rescue Plan Act Funding – PA Small Water and Sewer**
- Municipalities or municipal authorities may apply.
- **Application Deadline is December 21, 2022**
- Funding is available to assist with construction, improvement, expansion, rehabilitation, or repair of a water supply system, sanitary sewer system, and stormwater system projects
- Eligible projects are those that have a total project cost of not less than \$30,000 and not more than \$500,000.



Available Funding – cont'd.

- **Commonwealth Financing Authority: Covid 19 American Rescue Plan Act Funding – H2O PA**
- Municipalities or municipal authorities may apply.
- **Application Deadline is December 21, 2022**
- Funding is available to assist with the construction of drinking water, sanitary sewer and stormwater projects
- Available Funding: A minimum of \$500,000 or more and a maximum of \$20,000,000 for any project.



Technical Guidance – Notification Requirements for Spills, Discharges and Other Incidents That Threaten To Cause Pollution of the Waters of the Commonwealth

- The Draft Technical Guidance requires chloraminated systems to address ammonia in discharges.
- On April 21st, at the TAC Board Meeting, a TAC Subgroup Workgroup was formed to work with the PA DEP, both Clean Water and the Bureau of Safe Drinking Water to address the issues related to chloraminated discharges.
- The TAC Subgroup Workgroup and PA DEP were unable to address the industry issues of concern at the July 14th TAC Board Meeting, however, additional information regarding ammonia levels in spills and discharges was collected and presented at the October 27th TAC Board Meeting to the TAC members and Clean Water Bureau staff.
- The Technical Guidance information can be found at:
https://files.dep.state.pa.us/PublicParticipation/Advisory%20Committees/AdvCommPortalFiles/TAC/2022/BCW_Presentation_TGD1.pdf



Technical Guidance – Pennsylvania’s Public Water System Capability Enhancement Strategy – DEP ID: 391-0400-001

- Provides guidance to all community, nontransient noncommunity, and transient noncommunity drinking water systems, as well as DEP staff on the guidelines and implementation of the Commonwealth’s Public Water System Capability Enhancement Program.
- Purpose of the document is to establish a rational methodology to implement, track and allocate appropriate resources needed to meet the Federal requirements for a State capacity development strategy for all public water systems.
- Substantive revisions are proposed to the guidance to facilitate more effective use of grant funds from the US EPA by incorporating principles for long-term sustainability.



Drought Watch Remains for 20 Counties Lifted for 16 Counties

- PA DEP after meeting with the Commonwealth Drought Task Force lifted the drought watch for 16 counties on October 23rd. The watch remains for 20 counties:

Drought Watch: Cameron, Carbon, Centre, Clearfield, Clinton, Columbia, Dauphin, Juniata, Lebanon, Luzerne, Lycoming, Mifflin, Montour, Northampton, Northumberland, Perry, Potter, Schuylkill, Snyder and Union counties.

Drought Lifted: Berks, Bradford, Bucks, Delaware, Lackawanna, Lehigh, McKean, Monroe, Montgomery, Philadelphia, Pike, Sullivan, Susquehanna, Tioga, Wayne, and Wyoming counties.



Susquehanna River Basin Commission (SRBC)

- On November 1, 2022 SRBC announced the opening of their 2023 Consumptive Use Mitigation Grant Program. SRBC anticipates awarding \$4 - \$6 million in total grant funds to projects that help mitigate the consumptive use of water and improve drought resiliency in the Susquehanna River Basin.
- Application are due by January 31, 2023. Grant awards will be announced in April 2023.
- SRBC will hold informational webinars on Tuesday, November 15th at 10:00 a.m. and repeated on Thursday, December 8th at 2:00 p.m.
- For details visit the SRBC Grant Program Website:
<https://www.srbc.net/our-work/grants/consumptive-use-mitigation-grant.html>



TAC Board Meetings

- TAC now represents Public Water Systems (all sizes)
- The Agenda, previous Meeting Minutes and all of the documents and information for discussion can be viewed on the TAC Board website:
<https://www.dep.pa.gov/PublicParticipation/AdvisoryCommittees/WaterAdvisory/TAC/Pages/default.aspx>

NEXT TAC BOARD MEETING IS FRIDAY, FEBRUARY 17, 2023

NOTE: VIRTUAL ATTENDANCE IS AVAILABLE – SEE THE TAC BOARD WEBSITE FOR DETAILS.



TAC Board Meeting Information from the October 27, 2022 Meeting

- Information from the meeting is available at [Public Water System Technical Assistance Center Board \(pa.gov\)](http://PublicWaterSystemTechnicalAssistanceCenterBoard.pa.gov)
- PFAS Initial Compliance Monitoring Schedule Change Request Form: Instructions – To assist Community Water Systems and Nontransient Noncommunity Water Systems to comply with EPA's Fifth Unregulated Contaminant Monitoring Rule (UCMR 5) as well as the compliance required under PA's PFAS MCL Rule. Draft Form and Instructions.
- Business Plan Requirements & Instructions for New Community Water Systems
- Lead Service Line Inventories – Service Line Inventory Form (3930-FM-BSDW0042a)



QUESTIONS





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PowerPoint Presentation will be available at the following websites:

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www.paawwa.org

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